# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

6154 Mission Gorge Road

(Mail: Suite 205/Enter: Suite 106) San Diego, California 92120-1939

Telephone: (619) 265-5114



#### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 18, 1985

Mr. Ralph Edwards, Region Environmental Director Mobil Oil Corporation 612 South Flower Street Los Angeles, California 90017

Dear Mr. Edwards:

Enclosed is a copy of Cleanup and Abatement Order No. 85-68. This Cleanup and Abatement Order is being issued to Mobil Oil Corporation in response to the petroleum hydrocarbon leak in the underground tank system at Mobil Service Station No. 08-196 which occurred in 1984. As you know this leak in the underground tank system at Mobil Service Station No. 08-196 resulted in the release of 4000 to 4400 gallons of unleaded gasoline. It has since been determined that the leak resulted in the contamination of ground water at the site. Basically, the Cleanup and Abatement Order directs Mobil Oil Corporation to develop alternatives to cleanup the petroleum hydrocarbon contamination resulting from the underground tank leak. The Cleanup and Abatement Order also directs Mobil Oil Corporation to implement the cleanup alternative selected by Regional Board staff after staff's review of the cleanup alternatives developed by Mobil Oil Corporation.

This Cleanup and Abatement Order is issued to Mobil Oil Corporation under the authority of California Water Code Section 13304. Section 13304 provides:

(a) Any person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and shall upon order of the regional board clean up such waste or abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action. Upon failure of any person to comply with such cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring such person to comply therewith. In any such suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as

the facts may warrant.

- (b) The regional board may expend available moneys to perform any cleanup, abatement, or remedial work required under the circumstances set forth in subdivision (a) which in its judgment is required by the magnitude of endeavor or urgency of prompt action needed to prevent substantial pollution, nuisance, or injury to any waters of the state. Such action may be taken in default of, or in addition to, remedial work by the waste discharger or other persons, and regardless of whether injunctive relief is being sought. The regional board may perform the work itself, or by or in cooperation with any other governmental agency, and may use rented tools or equipment, either with operators furnished or unoperated. Notwithstanding any other provisions of law, the regional board may enter into oral contracts for such work, and the contracts, whether written or oral, may include provisions for equipment rental and in addition the furnishing of labor and materials necessary to accomplish the work. Such contracts shall be exempt from approval by the Department of General Services pursuant to the provisions of Section 14780 of the Government Code.
- (c) If such waste is cleaned up, the effects thereof abated, or, in the case of threatened pollution or nuisance, other necessary remedial action is taken by any governmental agency, the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), shall be liable to that governmental agency to the extent of the reasonable costs actually incurred in cleaning up such waste, abating the effects thereof, or taking other remedial action. The amount of such costs shall be recoverable in a civil action by, and paid to, such governmental agency and the state board to the extent of the latter's contribution to the cleanup costs from the State Water Pollution Cleanup and Abatement Account or other available funds.

- (d) If, despite reasonable effort by the regional board to identify the person responsible for the discharge of waste or the condition of pollution or nuisance, such person is not identified at the time cleanup, abatement or remedial work must be performed, the regional board shall not be required to issue an order under this section.
- (3) "Threaten," for purposes of this section, means a condition creating a substantial probability of harm, when the probability and potential extent of harm make it reasonable necessary to take immediate action to prevent, reduce or mitigate damages to persons, property, or natural resources.
- (f) This section does not impose any new liability for acts occurring before January 1, 1981, if the acts were not in violation of existing laws or regulations at the time they occurred.

(Amended by Stats. 1971, Ch. 1288; by Stats. 1980, Ch. 808.)

(Note the authority of regional boards in subsection (b) to expend available moneys to perform cleanup work when a cleanup order has been issued under subsection (a), and prompt action is needed to prevent substantial pollution or nuisance. Full authority to take all necessary action can be delegated to executive officer (Section 13223). "Available moneys" ordinarily refers to moneys in the State Water pollution and Abatement account (Section 13441). Funds made available from an outside source, such as the Federal Government, could also constitute "available moneys." Note that authority to expend moneys for cleanup requires an exercise of judgment be in writing. A letter to the state board should request needed funds and give the reasons in the context of the statue, such as the existence of an "urgency of prompt action is needed to prevent substantial pollution." A previous phone call could ascertain whether necessary funds are available.)

In order to avoid further enforcement action by the Regional Board, I strongly urge a prompt and complete response to each directive of Cleanup and Abatement Order No. 85-68. The issuance of this Cleanup and Abatement Order to Mobil Oil Corporation will be discussed at the July 29, 1985 Regional Board meeting. This meeting is open to public participation and you are welcome to attend. It is scheduled for 9:30 a.m. in Room Bl09 of the State Office Building, 1350 Front Street, San Diego.

Both my staff and I will be happy to work with you toward achieving compliance with the Cleanup and Abatement Order. If you have any questions or would like to set up a meeting to discuss this matter further, please contact Mr. Scott Hugenberger at (619) 265-5114.

Very truly yours,

LADIN H. DELANEY

SH: vn

cc: Ms. Mona Lisa Cole
State Department of Fish and Game
15582 Briarcliff
Westminster, CA 92683

Ms. Vicki Gallagher
Hazardous Materials Management Unit
Department of Health Services
1700 Pacific Highway
San Diego, CA 92101

## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

#### CLEANUP AND ABATEMENT ORDER NO. 85-68

MOBIL OIL CORPORATION
SERVICE STATION NO. 08-196
OCEANSIDE
SAN DIEGO COUNTY

The California Regional Water Quality Control Board, San Diego Region (hereinafter Regional Board) finds that:

- Mobil Service Station number 08-196 is located at the corner of Harbor Drive and Carmelo Drive in the City of Oceanside, just west of I-5. The site lies in the Mission Hydrographic Subarea of the San Luis Rey Hydrographic Subunit; the site elevation is approximately 50 feet MSL.
- 2. On April 24, 1984, Regional Board staff was notified by the office of Mr. Ralph Edwards, Regional Environmental Coordinator, Mobil Oil Corporation, that an investigation, prompted by the Mobil Station Number 08-196 gasoline inventory records, revealed a petroleum hydrocarbon leak in an underground product line. Mobil estimates that some 4000 to 4400 gallons of unleaded gasoline was lost as a result of the leak.
- 3. On June 12, 1984 Regional Board staff met with representatives of the State Department of Fish and Game, the City of Oceanside Fire Department, and Mobil Oil Corporation at the Mobil service station. Two of six monitoring wells on the Mobil Service Station property were observed to contain free petroleum hydrocarbon product on the well water surface. A well located due west of the petroleum hydrocarbon leak source (well no. 3) was found to contain 62 inches of free product on top of 42" of water. The free product was pumped off and the well was allowed to recharge. Less than 24 hours later, the well had 50 inches of free product on 40 inches of water.
- 4. Since April, 1984, Mobil Oil Corporation has taken remedial action to recover 1600 gallons of the estimated 4400 gallons of unleaded gasoline discharged to the ground water as the result of the leak. The 6000 gallons of water extracted with the recovered product was reinjected on site. The faulty underground tank and line system was replaced in July, 1984. A dozen monitoring wells have been drilled to determine the extent and migration pattern of the hydrocarbon plume.
- 5. The Comprehensive Water Quality Control Plan Report, San Diego Basin (9) (Basin Plan) was adopted by this Regional Board on March 17, 1975; approved by the State Water Resources Control Board on March 20, 1985; and updated by the Regional Board on February 27, 1978; March 23, 1981; January 24 and October 3, 1983; and August 27, 1984. The 1978, 1981, 1983 and 1984 updates were subsequently approved by the State Board.

- 6. The Basin Plan established no beneficial uses for the ground waters in the Mission Hydrographic Subarea west of I-5.
- 7. The Basin Plan established the following existing and potential beneficial uses for the water of Oceanside Harbor:
  - (a) Industrial Service Supply
  - (b) Navigation
  - (c) Water Contact Recreation
  - (d) Non-Contact Water Recreation
  - (e) Ocean Commercial and Sport Fishing
  - (f) Preservation of Rare and Endangered Species
  - (g) Marine Habitat
  - (h) Fish Migration
  - (i) Shellfish Harvesting
  - (j) Preservation of Areas of Special Biological Significance
- 8. The Basin Plan established the following beneficial uses for the mouth of the San Luis Rey River:
  - (a) Contact Water Recreation
  - (b) Non-contact Water Recreation
  - (c) Rare and Endangered Species
  - (d) Marine Habitat
- 9. Although the Basin Plan does not recognize any existing or potential uses of the ground water in the portion of the San Luis Rey Hydrographic Unit that is west of I-5, the ground water quality is subject to the provisions of the State Water Resources Control Board's Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality Waters in California (hereinafter referred to as the Nondegradation Policy). Under the terms and conditions of the Nondegradation Policy, the existing (pre-discharge) ground water quality of the Mission Hydrographic Subarea must be maintained unless it is demonstrated that a decrease in water quality (1) will be consistent with maximum benefit to the people of the State, (2) will not unreasonably affect beneficial uses, and (3) will not result in water quality less than prescribed in the Basin Plan or other adopted policies.
- 10. Section 13050(1) of the California Water Code defines "pollution" as follows:

"Pollution means an alteration of the quality of the waters of the State by waste to a degree which unreasonably affects (1) such waters for beneficial uses, or (2) facilities which serve such beneficial uses."

Constituent

11. To protect the beneficial uses listed in Findings 7 and 8, it is required that discharges to these water bodies not contain constituents exceeding the following applicable Environmental Protection Agency and Regional Board criteria for the protection of saltwater aquatic life:

Maximum Allowable Concentration

| Toluene                      | 5.0 mg/l   |
|------------------------------|------------|
| Benzene                      | 5.1 mg/1   |
| Ethyl Benzene                | 0.43  mg/1 |
| Phenols                      | 5.8  mg/l  |
| Total Petroleum Hydrocarbons | 15.0  mg/l |

- 12. The plume of petroleum hydrocarbon contaminated ground water discussed in Finding 3 threatens to cause a pollution in the waters of Oceanside Harbor and the mouth of the San Luis Rey River in that it contains constituents in excess of the saltwater aquatic toxicity levels described in Finding 11.
- 13. This enforcement action is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15321, Chapter 3, Title 14, California Administrative Code.

IT IS HEREBY ORDERED, That pursuant to Section 13304 of the California Water code:

- Mobil Oil Corporation shall submit a report to this office no later than August 19, 1985 identifying and developing a range of remedial action alternatives to cleanup the contamination resulting from the petroleum hydrocarbon discharge from Mobil Service Station No. 08-196. The report shall examine and determine the cost of each of the following cleanup strategies:
  - a) Treatment and/or removal of the contaminated ground water to attain the following criteria in the underlying ground water aquifer.

| Constituent                 | Maximum Concentration |  |
|-----------------------------|-----------------------|--|
|                             |                       |  |
| Toluene                     | 5.0 mg/l              |  |
| Benzene                     | 5.1 mg/l              |  |
| Ethyl Benzene               | 0.43  mg/l            |  |
| Phenols                     | 5.8 mg/l              |  |
| Total Petroleum Hydrocarbon | 15.0  mg/l            |  |

Note: mg/l = milligrams per liter

- b) Treatment and/or removal of the contaminated ground water to attain the naturally occurring background concentrations for the following constituents in the underlying ground water aquifer.
  - 1) Toluene
  - 2) Benzene
  - 3) Ethyl Benzene
  - 4) Phenols

Constituents

- 5) Total Petroleum Hydrocarbons
- c) A remedial action alternative that concedes the contaminated ground water to a degraded status. Under this alternative it must be conclusively demonstrated that migration of petroleum hydrocarbon contaminated ground water to either the mouth of the San Luis Rey River or Oceanside Harbor will not result in the discharge of contaminated ground water containing constituents in excess of the following limitations:

Maximum Allowable Concentration

# Toluene 5.0 mg/1 Benzene 5.1 mg/1 Ethyl Benzene 0.43 mg/1 Phenols 5.8 mg/1 Total Petroleum Hydrocarbon 15.0 mg/1

All variables associated with this alternative (e.g., ground water velocity field, dispersion coefficients, hydraulic conductivity, biodegradation rate constants, adsorption constants, porosity, etc.) must be fully identified and evaluated to a high level of confidence.

- 2. The Cleanup Alternatives required under Directive 1 of this Order will be evaluated in detail by Regional Board staff. This evaluation will include the technical considerations, estimated costs and anticipated water quality impacts associated with each alternative. Based on this evaluation a specific cleanup alternative will be selected by Regional Board staff for implementation. Upon notification by the Executive Officer, Mobil Oil Corporation shall implement the Cleanup Alternative selected by Regional Board staff.
- In the interim period until a final cleanup alternative is selected for implementation Mobil Oil Corporation shall continue to take:
  - a) Effective remedial action to protect the beneficial uses of the waters of Oceanside Harbor and the mouth of the San Luis Rey River.

- b) Effective remedial action to protect the beneficial uses of the waters of Oceanside Harbor and the mouth of the San Luis Rey River.
- c) Effective remedial action to remove all free petroleum hydrocarbon product from the affected ground water.
- 4. Mobil Oil Corporation shall dispose of petroleum hydrocarbon contaminated ground water and/or soil in accordance with all applicable state and federal regulations.
- 5. Mobil Oil Corporation shall, upon implementation of the selected cleanup alternative, submit quarterly reports discussing the cleanup program status and the progress made towards attaining the final selected cleanup criteria. Specific information to be included in the quarterly progress reports will be determined by Regional Board staff upon selection of the final cleanup alternative.

Ladin H. Delaney

Executive Officer

State of California Regional Water Quality Control Board San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT July 29, 1985

ITEM: 19

SUBJECT: MOBIL OIL CORPORATION, MOBIL SERVICE STATION 08-196, OCEANSIDE, SAN DIEGO COUNTY: CLEANUP AND ABATEMENT ORDER

DISCUSSION:

On April 24, 1984, Regional Board staff was notified by the office of Mr. Ralph Edwards, Regional Environmental Coordinator for Mobil Oil Corporation, that an investigation by Mobil revealed a petroleum hydrocarbon leak in an underground product line at Mobil Service Station Number 08-196 located at Harbor Drive and Interstate 5 in Oceanside, California. Mobil estimates that some 4000 to 4400 gallons of unleaded gasoline was released into the underlying ground water as a result of the leak.

On June 12, 1984 Regional Board staff inspected the site and observed free petroleum hydrocarbon product on the ground water surface in some monitoring wells that Mobil had installed. By manually bailing the monitoring wells, Mobil Oil Corporation has recovered approximately 1600 gallons of the petroleum product, since April, 1984.

Although the Basin Plan does not recognize any beneficial uses of the ground water west of I-5, which is where the Mobil service station is located, the ground water quality is subject to the provisions of the State Water Resources Control Board's Resolution No. 68-16, Statement of Policy with respect to maintaining high quality waters in California (hereinafter referred to as the Nondegradation Policy). Under the terms and conditions of the Nondegradation Policy, the existing ground water quality of the Mission Hydrographic Subarea must be maintained unless it is demonstrated that a decrease in water quality (a) will be consistent with maximum benefit to the people of the State, (2) will not unreasonably affect beneficial uses, and (3) will not result in water quality less than prescribed in the Basin Plan or other adopted policies.

Furthermore, Mobil Service Station 08-196 is located within 400 yards of both the Oceanside Harbor and the mouth of the San Luis Rey River. Since the ground water underlying the Mobil service station appears to be migrating in the direction of these surface water bodies, the beneficial uses of the latter could be threatened.

The Cleanup and Abatement Order contained in today's agenda establishes cleanup criteria for the site that are consistent with the Nondegradation Policy and with the protection of the beneficial uses of Oceanside Harbor and the mouth of the San Luis Rey River. Staff will make a brief presentation on the issuance of the Cleanup and Abatement Order to Mobil Oil Corporation.

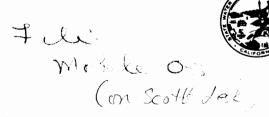
## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

6154 Mission Gorge Road

(Mail: Suite 205/Enter: Suite 106) San Diego, California 92120-1939

Telephone: (619) 265-5114

January 8, 1986



Mr. Ralph Edwards, Region Environmental Director Mobil Oil Corporation 612 South Flower Street Los Angeles, California 90017

Dear Mr. Edwards:

MOBIL OIL CORPORATION RESPONSE TO CLEANUP AND ABATEMENT ORDER NO. 85-68

On July 19, 1985 the Executive Officer of this Regional Board issued Cleanup and Abatement Order No. 85-68 to Mobil Oil Corporation in response to the underground petroleum hydrocarbon leak at Mobil Service Station No. 08-196 in the City of Oceanside. The Cleanup and Abatement Order directed Mobil Oil Corporation to develop and cost a range of remedial action strategies corresponding to the three sets of final cleanup levels listed in Directive 1 of Cleanup and Abatement Order No. 85-68, and to submit this report to this office for review. After review Regional Board staff would select one of the remedial action strategies to be implemented by Mobil Oil Corporation.

Mobil Oil Corporation submitted a report dated August 28, 1985 in response to Directive 1 of the Cleanup and Abatement Order. After reviewing this report Regional Board staff have determined that the report does not adequately respond to the aforementioned Directive 1. The report did not examine and develop remedial action alternatives, corresponding to the three final cleanup criteria, in sufficient detail. In addition the report did not present sufficient evidence to justify cleanup levels that concede the ground water to a degraded status. Regional Board staff comments on the report are listed below:

Page 08-196(2), Paragraph 4:

- A) Before effluent can be allowed to be injected into on-site monitoring wells, a thorough hydrogeologic analysis must be performed. This analysis must include, at least:
  - 1) Lithologic and construction data for all injection wells,
  - Background quality of ground water in the receiving water zone,
  - 3) Estimate of the hydraulic effect of injection (i.e., impact on the ground water potentiometric surface).

B) The term "practical minimum" with regard to free product removal should be more precisely defined than "a sheen on the ground water".

#### Page 08-196(3), Paragraph 4:

Are the terms "bio-stimulation" and "bio-degradation", used in paragraphs 3 and 4, intended to be synonymous? A discussion of these processes should be included.

#### Page 08-196(3), Paragraph 5:

- A) The contention that the third remedial action alternative, which concedes the contaminated ground water to a degraded status, "is the only realistic one" is not backed up with supporting documentation.
- B) The term "realistic level" needs a more precise definition.
- C) Air stripping and carbon adsorption currently represent the "best available technology" for the removal of dissolved petroleum hydrocarbon from contaminated ground water. These treatment processes, is properly designed, can achieve 99% removal of dissolved fuel constituents.
- D) Sufficient cost data was not submitted for either remedial action alternatives la and lb as required by Directive l of the Cleanup and Abatement Order.

#### Page 08-196(4), Paragraph 1:

- A) The term "practical level" is undefined.
- B) Is "TPM" equivalent to "mg/l"?

#### Page 08-196(4), Paragraph 2:

- A) No data have been presented to substantiate the statement "the ground water beneath the site is locally reversed".
- B) The May 6, 1985 letter by J.T. Alton, Inc. to Mobil Oil Corporation "discusses the hydrogeology of this site" in only two paragraphs. Further comments on this letter appear later in this letter.
- C) The statement that the subsurface "silty, clayey fine sand" "has a very low permeability" is not fully consistent with the given figure of "10<sup>-3</sup> to 10<sup>-5</sup> cm/sec". How was this measured? Materials defined to have a "very low permeability" are usually associated with values in the range of 10<sup>-5</sup> to 10<sup>-7</sup> cm/sec (See Sowers and Sowers, 1970, p. 93).

- D) No data were provided to substantiate the statement that "the ground water beneath the site is saline...". Results submitted to this office by Mobil Oil Corporation in a letter dated May 31, 1985 indicate a TDS of only 1,730 mg/l.
- E) How was the ground water flow rate of "0.4 feet per year" estimated? Page 08-196(4), Paragraph 3:
- A) Further documentation is required to support the statement that "there is a minimal likelihood of offsite migration of ground water contaminated to such a degree that discharge into the [San Luis Rey River and Oceanside Harbor] would exceed maximum allowable concentration...".
- B) It has not been demonstrated, as required under Directive lc, that "migration of petroleum hydrocarbon contaminated ground water to either the mouth of the San Luis Rey River or Oceanside Harbor will not result in the discharge of contaminated ground water containing constituents" exceeding the limits listed in Directive lc.
- C) Finally, in reviewing the information submitted to date, we have noted that there are no monitoring wells located downgradient of the contamination plume. The information submitted to date concerning the potential for migration of the contamination plume to either Oceanside Harbor or the mouth of the San Luis Rey River is at best inconclusive. Thus, I believe it is necessary to install monitoring wells at some point between the contamination plume and both Ocean-side Harbor and the San Luis Rey River. Proposed locations of monitoring wells should be identified.

I will now address the May 6, 1985 letter from J.T. Alton Inc. to Mobil Oil Corporation referenced in your August 28, 1985 response to Directive 1 of Cleanup and Abatement Order No. 85-68. Regional Board staff comments on this letter are listed below:

#### Page 1, Paragraph 3:

- A) What are the construction details of the injection well and the backup injection well?
- B) Well 5 was designated as the injection well because "it is beyond the free product plume and can be used for sweeping further free product toward the extraction well. Documentation should be provided demonstrating that the location of the injection well relative to the contamination plume is such that the contamination plume will be confined on site.

#### Page 2, Paragraph 2:

How can the system produce "approximately 14 gallons of waste water and free product, in volumes probably varying from ten to zero gallons per hour"? Is this a typographical error?

#### Page 2, Paragraph 5:

What data were used to establish the "hydrologic contours" drawn on the map?

#### Page 2, Paragraph 7:

Is the site topography the only documentation to support the statement that "the ground water gradient follows this pattern". Is this the basis on which the hydrologic contours were drawn on the map?

#### Page 2, Paragraph 8:

Please submit documentation supporting the statement that the ground water "movement will be slow since it is traveling in tight, low porosity silty sands". What is the porosity?

#### Page 3, Paragraph 1:

- A) Please submit supporting information demonstrating that the "recovery system will effectively prevent any further migration of this product plume"? Does this mean that both the free product and the dissolved product plumes will be immobilized under the proposed product recovery scheme?
- B) The statement that the "ground water with some contamination in the dissolved phase should become biodegraded with time; this aspect also presents no pollution problem to waters other than the ground water in the immediate site area" is unsubstantiated. This report does not constitute a demonstration that the dissolved hydrocarbon plume "presents no pollution problems to waters other than the ground water in the immediate site area."

In conclusion, I request that you submit a revised cleanup strategy report addressing the foregoing comments to this office no later than February 15, 1986. If Mobil Oil Company wishes to proceed with remedial action alternative la or lb, it will not be necessary to address remedial action alternative lc in the revised report.

In the interim, until a final remedial action plan is selected and approved, Mobil Oil Corporation shall continue to take:

 effective remedial action to protect the beneficial uses of the waters of Oceanside Harbor and the mouth of the San Luis Rey River;

- effective remedial action to immobilize the plume of petroleum hydrocarbon contaminated ground water;
- c) effective remedial action to remove all free petroleum hydrocarbon product from the affected ground water.

In the meantime if you have any questions regarding this matter please contact Mr. Scott Hugenberger at (619) 265-5114.

Very truly yours,

DAVID T. BARKER Senior Engineer

SGH/vn

cc: Dr. Jeffrey Wiegand, Vice-President J. T. Alton, Inc. 16510 Aston Street Irvine, CA 92714

> Ms. Victoria Gallagher Hazardous Materials Management Unit Department of Health Services 1700 Pacific Highway San Diego, CA 92101

| Clerical Information Form (Please check applicable information for work desired)  |
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| (THIS FORM MUST ACCOMPANY ALL WORK TO BE PROCESSED BY THE TYPISTS)  |
| Type of Format Due Date: 1/7/86 DATE SUBMITTED: 12/30/85  |
| WDR NPDES Addendum Resolution C&D Order TCO   |
| Cleanup & Abatement Letterhead Memo letterhead Internal Memo  |
| Memorandum staff report C&D staff report Formal staff report  |
| Other   |
| Word processing format ID Code County Coops   |
| Task Code: 120-17   |
| File Designation: Mobil Oceanside (which is at Scott's Destr)   |
| (Disch. Corr Disch. Tech General)   |
| Material prepared by: SGH   |
| For signature of: DB  |
| cc's to: 6 Health.  |
| J.T Alton Ing   |
| SPECIAL INSTRUCTIONS  |
| (certified mail, return receipt, Express Mail, Federal Express, etc.)   |
| Copy of notification letter in WDS computer in-basket   |
| IF THIS IS AN EXPEDITE ITEM, PLEASE CHECK HERE AND FILL IN DATE/TIME  REQUIRED TO BE COMPLETED  (attach red "Expedite" tag) |
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11/85

| PS Form 3811, July 1983 | SENDER: Complete items 1, 2, 3 and 4.  Put-your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested. |  |  |  |
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| 1983                    | 1. Show to whom, date and address of delivery. 2. Restricted Delivery.  |  |  |  |
|                         | 3. Article Addressed to:  Ralph Edwards  Mobil Oil  612 Flower St.  Les Angeles, CA 90017  4. Type of Service:  Article Number  |  |  |  |
|                         | Article Number  Registered Insured Cortified COD Express Mail   |  |  |  |
|                         | Always obtain signature of addressee or agent and DATE DELIVERED.   |  |  |  |
| MOD                     | 5. Signature – Addressee  |  |  |  |
| ESTIC                   | 6. Signature – Agent<br>X   |  |  |  |
| RETU                    | 7. Date of Delivery   |  |  |  |
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